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LIFTED RESEARCH GROUP

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

LIFTED RESEARCH GROUP,	)	Case No.: C 08-04495 JCS
	)	
Plaintiff,	)	<b>THE PARTIES' REQUEST AND</b>
	)	<b>[PROPOSED] ORDER TO CONTINUE</b>
v.	)	<b>CASE MANAGEMENT CONFERENCE</b>
	)	<b>AND CORRESPONDING DEADLINES</b>
AYOUB I. RAHMAN, et al.	)	
	)	
Defendants.	)	
	)	
	)	
	)	

Plaintiff Lifted Research Group ("Plaintiff") and Defendants Ayoub I. Rahman a/k/a Ayoub Abdelrahman d/b/a Clothing Town ("Defendants") (collectively, the "Parties") hereby request that this Court continue all deadlines this matter, as set forth herein.

The Parties make this request, not for the purpose of delay or hindrance, but for good cause on the basis that the Parties are currently discussing settling this matter. The Parties believe in good faith that settlement negotiations could prove fruitful if the Court grants the Parties additional time in which they can make further efforts to resolve this matter.

Consequently, the Parties respectfully request that the Court extend the deadlines by approximately sixty (60) days as set forth below:

Description	Original Deadline	New Deadline
Last day to: meet and confer re: initial disclosures, early settlement, ADR process selection and discovery plan.	December 19, 2008	February 20, 2009
Last day to file Joint ADR Certification or Notice of Need for ADR Phone Conference	December 19, 2008	February 20, 2009
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Conference Statement per standing Order re Contents of Joint Case Management Statement	January 2, 2009	March 6, 2009
Initial Case Management Conference	January 9, 2009, 1:30 p.m.	March 13, 2009, 1:30 p.m.

For the reasons set forth herein, the Parties respectfully request the Court to continue the deadlines as described above.

Dated: December 19, 2008

KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP

By: \_\_\_\_\_/s/\_\_\_\_\_

ANNE E. KEARNS

Attorneys for Plaintiffs Lifted Research Group

Dated: December 19, 2008

COLLETTE ERICKSON FARMER & O'NEILL LLP

By: \_\_\_\_\_/s/\_\_\_\_\_

ROD DIVELBISS

Attorneys for Defendants Ayoub I. Rahman a/k/a/  
Ayoub Abdelrahman d/b/a/ Clothing Town

**ORDER**

The Court has considered the Parties' Request to Continue the Case Management Conference and Corresponding Deadlines all other materials presented to the Court, and GOOD CAUSE APPEARING, Plaintiffs' Request is hereby **GRANTED**, and the deadlines are extended as follows:

Description	Original Deadline	New Deadline
Last day to: meet and confer re: initial disclosures, early settlement, ADR process selection and discovery plan.	December 19, 2008	February 20, 2009
Last day to file Joint ADR Certification or Notice of Need for ADR Phone Conference	December 19, 2008	February 20, 2009
Last day to file Rule 26(f) Report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Conference Statement per standing Order re Contents of Joint Case Management Statement	January 2, 2009	March 6, 2009
Initial Case Management Conference	January 9, 2009, 1:30 p.m.	March 13, 2009, 1:30 p.m.

**IT IS SO ORDERED.**

DATED: January 5, 2009

